

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

NELSON L. BRUCE,)	
)	
Plaintiff,)	Case No.
)	2:21-cv-03603-BHH-MGB
v.)	
)	
EQUIFAX INFORMATION SERVICES,)	
LLC; EXPERIAN INFORMATION)	
SOLUTIONS, INC., TRANS UNION, LLC,)	
and UNKNOWN DOES 1-100,)	
)	
Defendants.)	
)	

**EXPERIAN INFORMATION SOLUTIONS, INC.’S
RESPONSES TO LOCAL RULE 26.01 INTERROGATORIES**

Defendant Experian Information Solutions, Inc. (“Experian”), by its undersigned counsel, hereby responds to the Local Rule 26.01 Interrogatories as follows:

INTERROGATORY (A): State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Experian is not aware of any persons or legal entities with subrogation interests.

INTERROGATORY (B): As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Experian does not demand a jury trial.

INTERROGATORY (C): State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent

or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Experian is not a publicly owned company. The ultimate parent company of Experian is Experian plc, which owns 100 percent of Experian. Experian plc is registered as a public company in Jersey, Channel Islands, and is publicly traded on the London Stock Exchange. The following companies are the U.S.-based subsidiaries of Experian plc that are not wholly owned: Central Source LLC, Online Data Exchange LLC, New Management Services LLC, VantageScore Solutions LLC, and Opt-Out Services LLC.

INTERROGATORY (D): State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Experian does not challenge the appropriateness of the division.

INTERROGATORY (E): Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) the explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Experian is unaware of any related matter filed in this District.

INTERROGATORY (F): If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Experian Information Solutions, Inc. is properly identified.

INTERROGATORY (G): If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: While Experian does not make such a contention at this time, it reserves the right to supplement its response after conducting discovery.

Dated: December 28, 2021

Respectfully Submitted,

/s/Lyndey R. Z. Bryant

Lyndey R. Z. Bryant (Fed. ID No. 11506)

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CERTIFICATE OF SERVICE

A copy of the foregoing was filed on December 28, 2021, with the Court via the CM/ECF system, causing it to be served on all counsel of record. In addition, a copy of the foregoing was sent via mail and email to *pro se* Plaintiff at the physical address and email address listed below:

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Plaintiff, Pro Se

/s/ Lyndey R. Z. Bryant

Lyndey R. Z. Bryant

*Counsel for Defendant
Experian Information Solutions, Inc.*